

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

23-CR-99-LJV-JJM

SIMON GOGLACK, et al.,

Defendants.

MOTION TO SET A BRIEFING SCHEDULE

PLEASE TAKE NOTICE that upon the affirmation of Caitlin M. Higgins, Assistant United States Attorney, the undersigned hereby moves this Court to set a briefing schedule with respect to defendant Hinkle's motion for release (*see* Docket No. 174).

DATED: Buffalo, New York, August 5, 2024.

TRINI E. ROSS
United States Attorney

BY: /s Caitlin M. Higgins
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Defendants.

AFFIRMATION

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

Caitlin M. Higgins, being duly sworn, deposes and states:

1. I am an Assistant United States Attorney for the Western District of New York assigned to the prosecution of the above-referenced case. This affidavit is submitted in support of the government's motion to set a briefing schedule with respect to defendant Hinkle's motion for release (*see* Docket No. 174).

2. On August 1, 2024, defendant Hinkle filed a motion for release. *See* Docket No. 174. Consistent with W.D.N.Y. Local Rule of Criminal Procedure 12(b)(2), the government requests that the Court set a briefing schedule wherein the government will have 14 days from the date of the filing to respond to the motion, and the defendant will have 7 days from the date of the government's response to reply. Under this proposed schedule, the

government's response will be due on August 15, 2024, and the defendant's reply will be due on August 22, 2024.

3. Should the Court set a different schedule than the proposed schedule above, the government will comply with the Court's imposed schedule.

/s/ Caitlin M. Higgins
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